

Ingram, Earl

From: Herndon, George
Sent: Tuesday, March 25, 2014 2:58 PM
To: Samek, Karen
Subject: FW: Question regarding treated seeds

Categories: Blue Category

Karen,

Just spoke to Jeff Evans and I think I got the answer – WPS does not apply to planted treated seeds.
Jeff

From: Dawson, Jeffrey
Sent: Tuesday, March 25, 2014 12:59 PM
To: Samek, Karen
Cc: Herndon, George
Subject: RE: Question regarding treated seeds

Karen,

This is my own opinion but I think if they left it off we would not be losing anything because most/all of the treated seeds will meet the exemption criteria anyway – corn, soy, canola, etc. are all directly placed in ground, etc. Also, because of the coatings I don't see much/any potential for exposure because the residues would be retained and if they aren't the treatment doesn't work.

Here is the link to the REI criteria in the WPS but I don't think it says anything about seeds.

<http://www.ecfr.gov/cgi-bin/text-idx?SID=90ff45cb1f490be907cddc78467e0d8a&node=40:25.0.1.1.7.8.1.5&rgn=div8>

I would ask Jeff Evans or Kathy Davis about any more detailed info on the WPS. They could also tell you about the updated one.

Hope this helps

Jeff

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From: Samek, Karen
Sent: Tuesday, March 25, 2014 12:27 PM
To: Dawson, Jeffrey
Cc: Herndon, George
Subject: Question regarding treated seeds

Hi Jeff,

Jeff Herndon and I are meeting with a CLA workgroup tomorrow at 3pm to discuss statements that should be on treated seed bag tag and what statements could be left off the bag tag. They would like to leave the statement below off seed bag tags. Before we meet with them on this, I am trying to find out a little more about when WPS applies with regards to post planted treated seed. I was wondering if you know of anything that would fall under "worker protection Standards" for seeds that have already been planted in the field. Does WPS apply? If you could help me with this or point me in the direction of someone to talk to about this that would be great!

Here is the bag tag statment CLA feels should not be on the seed tag/bags:

"After seeds have been planted, do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of X hours. Exception: Once seeds are planted and covered by soil or other planting media, the Worker Protection Standard (WPS) allows workers to enter the treated area without restriction."

I'm on leave today but can be reached by cell at [REDACTED] I will be in the office tomorrow.

Thanks,
Karen

Personal privacy information

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